

November 5, 2003

Mr. Tony Croteau  
National By-Products, Inc.  
700 W. Southern Avenue  
Indianapolis, IN 46225

Re: First Administrative Amendment A097-18229-00243 to Federally Enforceable State Operating Permit F097-14070-00243

Dear Mr. Croteau:

National By-Products, LLC. was issued a permit on December 18, 2002 for an animal by-product rendering source. A letter requesting changes to this permit was received on October 15, 2003.

The letter received on October 15, 2003 requested that the pressure drop range for the Venturi scrubber described in Section D.2, be changed from 3 to 6 inches of water column to 2 to 10 inches of water column. Upon review, IDEM and OES have determined that the FESOP renewal F097-14070-00243 incorrectly contained a pressure drop range of 3 to 6 inches. The range should have been 2 to 10 inches of water column. The original FESOP issued to National By-Products, Inc. (097-5579-00243) contained a range of 2 to 10 inches of water column. This range should have been carried over in the renewal issued on December 18, 2002. Actions which correct typographical errors shall be processed as administrative amendments.

Pursuant to the provisions of 2-8-10(a)(1), the permit is hereby administratively amended as follows:

**D.2.8 Parametric Monitoring**

---

The Permittee shall record the total static pressure drop across the scrubber controlling emissions from emission unit #3 the animal by-products rendering system, at least once per shift when emission unit #3 the animal by-products rendering system is in operation. When for any one reading, the pressure drop across the scrubber is outside the normal range of ~~3.0 and 6.0~~ **two (2) to ten (10)** inches of water **column** or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan-Failure to Take Response Steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a ~~violation of~~ **deviation from** this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and OES and shall be calibrated at least once every six (6) months.

Condition C.16(b)(4) Compliance Response Plan will be changed as follows:

Failure to take reasonable response steps shall constitute a ~~violation of~~ **deviation from** the permit.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Amanda Hennessy at (317) 327-2510.

Sincerely,

Original Signed by John B. Chavez

John B. Chavez  
Administrator

Enclosure: Amended Permit pages

ajh

cc: U.S. EPA, Region V  
Mindy Hahn - IDEM OAQ  
Matt Mosier - Compliance  
Amanda Hennessy - Permits

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP) RENEWAL  
INDIANA DEPARTMENT OF ENVIRONMENTAL  
MANAGEMENT  
OFFICE OF AIR QUALITY  
and  
THE CITY OF INDIANAPOLIS  
OFFICE of ENVIRONMENTAL SERVICES**

**National By-Products, Inc.  
700 W. Southern Ave.  
Indianapolis, Indiana 46225**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F097-14070-00243	
Issued by:  Original Signed by John B. Chavez  John B. Chavez Administrator, OES	Issuance Date: 12-18-2002  Expiration Date: 12-18-2007
First Administrative Amendment No.: A097-18229-00243	Pages Affected: 1, 23 and 31
Issued by: Original Signed by John B. Chavez   John B. Chavez Administrator Office of Environmental Services	Issuance Date: 11-5-2003

- (4) Failure to take reasonable response steps shall constitute a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

#### **D.2.5 VOC Emissions**

Compliance with Condition D.2.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

#### **D. 2.6 Testing Requirements [326 IAC 2-8-5]**

In order to demonstrate compliance with Condition D.2.1 and D.2.2, the Permittee shall perform VOC and PM testing utilizing methods as approved by the Commissioner of IDEM and Administrator of OES. This test shall be repeated at least once every five (5) years from the date of a valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

### **Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]**

#### **D.2.7 Visible Emissions Notations**

- (a) visible emission notations of the Emission Units #1 and #2 stack exhausts shall be performed once per shift during normal daylight operations when burning distillate oil #2 or Animal Fat/Greases and exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Preventive Maintenance Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

#### **D.2.8 Parametric Monitoring**

The Permittee shall record the total static pressure drop across the scrubber controlling emissions from emission unit #3 the animal by-products rendering system, at least once per shift when emission unit #3 the animal by-products rendering system is in operation. When for any one reading, the pressure drop across the scrubber is outside the normal range of two (2) to ten (10) inches of water column or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan-Failure to Take Response Steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and OES and shall be calibrated at least once every six (6) months.

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

#### **D.2.9 Record Keeping Requirements**

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.1.